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February 1, 2023

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Pamela K. Chen, U.S.D.J.  
225 Cadman Plaza East  
Courtroom 4F North  
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.  
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Chen:

This law firm was recently retained to represent defendants Gregory Elefterakis (“Elefterakis”), Roman Pollak (“Pollak”), and Anthony Bridda (“Bridda”) (collectively “defendants”) and write to request an extension of defendants’ time to answer and/or otherwise respond to plaintiff’s first amended complaint until March 3, 2023. Plaintiff has consented to same.

Pursuant to your Honor’s Individual Practices and Rules, plead be advised that: (a) Elefterakis, Pollack and Bridda’s time to answer was originally scheduled for February 2, 2023 (see Docket Entry [129](#)); (b) defendants herein have not made any prior requests for an extension of time to answer and/or otherwise respond to plaintiff’s first amended complaint; (c) plaintiff consented to the requested adjournment by email dated February 1, 2023; and (d) no other deadlines are affected by this request for an extension.

We thank the Court for its courtesies and cooperation.

Respectfully submitted,

Melanie I. Wiener

cc: All counsel (via ECF)